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*Attorneys for Claimant*  
THE MOSSE FOUNDATION

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA,

Plaintiff,

v.

ONE PAINTING ENTITLED “WINTER,”  
aka “SKATERS” aka “SNOW,”

Defendant.

Case No. 1:19-cv-1271 (MAD/CFH)

**THE MOSSE FOUNDATION’S  
AMENDED ANSWER TO VERIFIED  
COMPLAINT FOR FORFEITURE *IN*  
*REM***

Claimant THE MOSSE FOUNDATION, by its attorney Charles G. La Bella, on behalf of itself, JOY MOSSE, and the UNIVERSITY OF WISCONSIN, as Successor to Felicia Lachmann-Mosse, sole heir to Rudolf Mosse (hereafter “Claimant”), answers Plaintiff UNITED STATES OF AMERICA’s Verified Complaint for Forfeiture *In Rem* against the painting entitled, “Winter” aka “Skaters” aka “Snow,” by the artist Gari Melchers.

1. Claimant admits the allegations contained in paragraphs 1 through 26.
2. Claimant admits the allegations contained in paragraphs 27 through 33 on information belief.

**PRAYER**

WHEREFORE, Claimant prays that the Court enter judgment directing that the above-described painting be forfeited and returned it to The Mosse Foundation on behalf of itself, University of Wisconsin, and Joy Mosse.

DATED: December 18, 2019

**BARNES & THORNBURG LLP**

By: /s/ Charles G. La Bella

Charles G. La Bella

*Attorneys for Claimant*

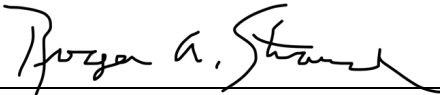
THE MOSSE FOUNDATION

**VERIFICATION**

I, Roger Strauch, as a Trustee of The Mosse Foundation, being duly sworn, deposes and states that:

I am a Trustee of The Mosse Foundation, a non-profit foundation established to hold and administer the assets of Hilde Mosse. I have read the attached CLAIMANT'S AMENDED ANSWER TO VERIFIED COMPLAINT FOR FORFEITURE *IN REM* to the action *in rem* filed by United States of America. The facts as stated in the Amended Answer are true to the best of my knowledge and belief, based upon knowledge possessed by me, and/or information obtained during the course of a lengthy investigation into the affairs of Felicia Lachmann-Mosse and Hans Lachmann-Mosse and the expropriation of their art collection by the Nazi regime in 1933.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct. Dated this 18th day of December, 2019 at Martha's Vineyard, Massachusetts.

  
\_\_\_\_\_  
Roger Strauch

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK**

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UNITED STATES OF AMERICA, Plaintiff.

v.

**Case No.** 1:19-cv-1271 (MAD/CFH)

ONE PAINTING ENTITLED " WINTER, "  
aka " SKATERS " aka " SNOW, " Defendant.

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**CERTIFICATE OF SERVICE**

**I hereby certify that on December 18, 2019, I electronically filed the foregoing with the Clerk of the District Court using the CM/ECF system, which sent notification of such filing to the following:**

1. Christopher Robert Moran christopher.r.moran@usdoj.gov, CaseView.ECF@usdoj.gov, Michele.M.Hayes@usdoj.gov
2. James F. Murdica jmurdica@btlaw.com, sjohnston@btlaw.com
- 3.
- 4.

**And, I hereby certify that I have mailed by the United States Postal Service the document to the following non-CM/ECF Participants:**

- 1.
- 2.
- 3.

**S/(Name)** Charles G. La Bella